| UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK | . 37 | |
|---|----------|---------------------|
| ST SHIPPING AND TRANSPORT, INC., | X : | |
| Plaintiff, | : : | 07 Civ. 11147 (SAS) |
| - against - | : · : | ECF CASE |
| GOLDEN FLEECE MARITIME INC., | : | · · · |
| Defendant. | : | NOTICE OF MOTIONS |
| BLANCA SHIPMANAGEMENT COMPANY, | : | |
| Third-Party Claimant, | : | |
| | X | |

SIRS:

PLEASE TAKE NOTICE that pursuant to Supplemental Admiralty Rule E(4)(f) and Local Admiralty Rule E.1, Third-Party Claimant, BLANCA SHIPMANAGEMENT COMPANY ("Blanca"), by and through its undersigned counsel, moves this Court for vacatur of the attachment over its funds as the named Defendant, Golden Fleece Maritime Inc., does not have an attachable property interest in such funds.

FURTHERMORE, PLEASE TAKE NOTICE that pursuant to Supplemental Admiralty Rule E(4)(f) and Local Admiralty Rule E.1, Defendant, GOLDEN FLEECE MARITIME INC. ("Golden Fleece"), by and through its undersigned counsel moves this Court for vacatur of the Ex-Parte Order(s) of Attachment issued herein and for the dismissal of the action against it as Plaintiff abused the attachment procedure.

The above Motions of Blanca and Golden Fleece are based on the accompanying Memorandum of Law and the supporting Declarations of Nancy R. Peterson, Alexandra Chatzimichailoglou and Duncan McDonald, and all prior proceedings and pleadings in this

matter. Said motions shall be heard before the Honorable Shira A. Scheindlin at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St, Courtroom 15C, New York, NY 10007 at a time and date to be determined by the Court.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, are due by July 17, 2008, and that reply papers if any, are due by July 28, 2008.

Dated: Southport, CT July 3, 2008

Third Party Claimant,
BLANCA SHIPMANAGEMENT COMPANY and

Defendant, GOLDEN FLEECE MARITIME INC.,

By:

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Nancy R. Peterson

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AFFIRMATION OF SERVICE

I hereby certify that on July 3, 2008, a copy of the foregoing Notice of Motions was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: New P. Detamon